

1 ALISON M. BRASIER, ESQ.
2 Nevada Bar No. 10522
3 **HICKS & BRASIER, PLLC**
4 4101 Meadows Lane, Suite 210
5 Las Vegas, Nevada 89107
6 Phone: (702) 628-9888
7 Fax: (702) 960-4118
8 E-Mail: abrasier@chblawyers.com
9 *Attorneys for Plaintiff*

10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

RUTH ESPINOZA,) CASE NO: 2:18-CV-00112-GMN-GWF
)
Plaintiff,) **FIRST STIPULATION AND ORDER
vs.) TO EXTEND DISCOVERY
Defendants.) DEADLINES**
SMITH'S FOOD & DRUG CENTERS,)
INC. a Ohio Corporation, SMITH'S FOOD)
& DRUG CENTERS, a Nevada Business)
Trust; and DOE PERSONS I through X,)
inclusive; and ROE CORPORATIONS XI)
through XX, inclusive,)
Defendants.)

Pursuant to LR IA 6-1 and LR 26-4, the parties, by and through their respective
counsel, hereby stipulate and request that this Court extend the deadline for discovery in the
above-captioned matter for forty-five (45) days, or up to and including September 6, 2018.

DISCOVERY COMPLETED:

- Plaintiff has served her Initial Disclosures and supplements thereto.
- Defendant has served its Initial Disclosures and supplements thereto.
- Defendants have served subpoenas duces tecums to all of Plaintiff's medical providers.
- Plaintiff's deposition has been taken.
- Plaintiffs have served and responded to written discovery.
- Defendants have served and responded to written discovery.

1 **REMAINING DISCOVERY TO BE COMPLETED:**

2 • Initial and rebuttal expert disclosures;

3 • Fact and expert witness depositions; and

4 • Any additional written discovery that may be necessary following this discovery.

5 **REASONS WHY EXTENSION REQUESTED:**

6 On May 7, 2018, Plaintiff was informed that her medical expert was no longer able to
 7 prepare a report due to his father being ill and the expert consequently needing to be out of the
 8 country for an extended period of time. Due to the extent of Plaintiff's claimed injuries, it is
 9 not feasible for Plaintiff to retain another expert — and for that expert to effectively write a
 10 report — by the current expert disclosure deadline, which is 17 days away. Plaintiff is
 11 diligently working to retain a new expert and to get the relevant records to a new expert to
 12 reduce any delay.

13 Based on foregoing, good cause exists to extend the discovery deadline to allow
 14 Plaintiffs to take these outstanding depositions.

15 **PROPOSED SCHEDULE FOR REMAINING DEADLINES:**

16 The following is a list of the current deadlines and the parties' proposed extended
 17 deadlines:

| | Current | Proposed |
|----------------------|-----------|-----------|
| Discovery Cut-Off | 7/23/2018 | 9/6/2018 |
| Expert Disclosure | 5/24/2018 | 7/6/2018 |
| Rebuttal Disclosures | 6/25/2018 | 8/6/2018 |
| Dispositive Motions | 8/22/2018 | 10/5/2018 |
| Pre-Trial Order | 9/21/2018 | 11/6/2018 |

24 This is the first request for extension of time in this matter. The parties respectfully
 25 submit that the reasons set forth above constitute "good cause" justifying the extension.

26 ///

27 ///

28

1 Wherefore, the parties respectfully request that this Court extend the discovery period
2 by forty-five (45) days from the current deadline of July 23, 2018, up to and including
3 September 6, 2018, and the other discovery dates as outlined in accordance with the list above.

4 DATED THIS 7th day of May, 2017.

5 **HICKS & BRASIER, PLLC**

6 */s/ Alison M. Brasier*
7

8 ALISON M. BRASIER, ESQ.
9 Nevada Bar No. 10522
10 4101 Meadows Lane, Suite 210
11 Las Vegas, Nevada 89107
12 *Attorneys for Plaintiff*

13 **COOPER LEVENSON, P.A.**

14 */s/ Jerry S. Busby*
15

16 Jerry S. Busby, Esq.
17 Nevada Bar No. 1107
18 1835 Village Center Circle
19 Las Vegas, NV 89134
20 *Attorneys for Defendant*

21 IT IS SO ORDERED.

22 May 9th, 2018.

23 

24 GEORGE FOLEY, JR.
25 United States Magistrate Judge
26
27
28